

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

KAM WONG,

Defendant.

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**DECLARATION OF SENIOR
INSPECTOR JOHN CALABRIA**

18 Cr. 737 (JGK)

STATE OF NEW YORK)
COUNTY OF NEW YORK : ss.:
SOUTHERN DISTRICT OF NEW YORK)

JOHN CALABRIA, under penalty of perjury, declares:

1) I am a Senior Inspector with the United States Marshals Service. I have been a Senior Inspector for the United States Marshal for thirteen (13) years and I have participated in numerous investigations involving financial crimes and the forfeiture of assets. I have received relevant training and have personally participated in, among other things, extensive investigations involving financial crimes, to include wire fraud and money laundering.

I respectfully make this declaration in connection with the Government's application for a Preliminary Order of Forfeiture as to Substitute Assets as to the following:

a. Any and all assets on deposit in the following accounts:

| <u>Financial Institutions</u> | <u>Account Information</u> |
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| 1. JPMorgan Chase N.A. | Any and all funds on deposit in account number 000002902408174 , held in the names of Kam H. Wong and Ruby B. Wong |
| 2. JPMorgan Chase N.A. | Any and all funds on deposit in account number 000000781197041, sub-account numbers 781197041 and 2922408174, held in the names of Kam H. Wong and Ruby B. Wong |
| 3. JPMorgan Chase N.A. | Any and all funds on deposit in account number 000002902408174, held in the names of Kam H. Wong and Ruby B. Wong |
| 4. HSBC | Any and all funds on deposit in account number 132-73683-7, sub-account numbers 132-67056-9 and 132-68358-0, held in the names of Kamhung Wong and Ruby Wong |
| 5. HSBC | Any and all funds on deposit in account number 132-67056-9, held in the names of Kamhung Wong and Ruby Wong |
| 6. HSBC | Any and all funds on deposit in account number 132-68358-0, held in the names of Kamhung Wong and Ruby Wong |
| 7. Bank of America, N.A. | Any and all funds on deposit in account number 4830 2004 0104, held in the names of Kam H. Wong, Ruby B. Wong, and ITF Kevin Wong |
| 8. Bank of America, N.A. | Any and all funds on deposit in account number 4830 2003 5766, held in the names of Kam H. Wong, Ruby B. Wong, and ITF Kevin Wong |

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| 9. Bank of America, N.A. | Any and all funds on deposit in account number 910 001 2762 4763, held in the names of Kam H. Wong, Ruby B. Wong, and ITF Kevin Wong |
| 10. Sterling National Bank | Any and all funds on deposit in account number 9001600247, held in the names of Kam Hung Wong and Ruby Wong |
| 11. Sterling National Bank | Any and all funds on deposit in account number 8311137833, held in the names of Kam Hung Wong and/or Ruby Wong |
| 12. Sterling National Bank | Any and all funds on deposit in account number 8310066378, held in the names of Kam Hung Wong, Ruby Wong, and/or Boy You May |
| 13. Sterling National Bank | Any and all funds on deposit in account number 9000849696, held in the names of Kam Hung Wong and Ruby Wong |
| 14. Sterling National Bank | Any and all funds on deposit in account number 9000370922, held in the names of Kam Hung Wong and Ruby Wong |
| 15. Ascensus (401K) C/O Municipal Credit Union | Any and all funds on deposit in account number 270046, held in the name of Kam Hung H Wong |
| 16. Wells Fargo Advisors, LLC | Any and all funds on deposit in account number 6080-6877, held in the name of Kam Wong |
| 17. Wells Fargo Advisors, LLC | Any and all funds on deposit in account number 8761-2599, held in the name of Kam H. Wong |
| 18. Wells Fargo Advisors, LLC | Any and all funds on deposit in account number 1864-5558, held in the names of Kam H. Wong and FBO Madeline Elizabeth Wong |
| 19. Citibank, N.A. | Any and all funds on deposit in account number 921838, sub-account numbers 68706907, 994914158, and 4991708912, held in the names of Kam Hung Wong and Ruby B. Wong |

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| 20. Citibank, N.A. | Any and all funds on deposit in account number 9967173420, sub-account number 9959039790, held in the names of Kam H. Wong and Ruby Wong |
| 21. Citibank, N.A. | Any and all funds on deposit in account number 9949141548, held in the names of Kam H. Wong and Ruby Wong |
| 22. Citibank, N.A. | Any and all funds on deposit in account number 68706907, held in the names of Kam Hung Wong and Ruby B. Wong |
| 23. Citibank, N.A. | Any and all funds on deposit in account number 4992124142, held in the names of Kam H. Wong and Ruby Wong |
| 24. Citibank, N.A. | Any and all funds on deposit in account number 34733544, held in the names of Kam Hung Wong and Ruby B Wong |
| 25. Citibank, N.A. | Any and all funds on deposit in account number 2001079100-0, held in the names of Kam Hung Wong and Ruby B Wong |
| 26. Municipal Credit Union | Any and all funds on deposit in account number 362086, held in the name of Kam Wong |
| 27. Municipal Credit Union | Any and all funds on deposit in account number 1387146, held in the name of Kam Wong |

b. any and all of the following property:

1. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements thereon, located at 918 Ascan Street, Valley Stream, NY 11580;

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| 2. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements thereon, located at 1717 East 14th Street, Apt. J, Brooklyn, NY 11201 |
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c. any and all of the following vehicles:

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| 1. One 2013 Land Rover Range Rover suburban blue bearing vehicle identification number: SALGS2DF6DA110370 |
| 2. One 2015 Mercedes Benz; suburban; white bearing vehicle identification number: WDDTG5CB0FJ107917 |
| 3. One 2012 Land Rover Range Rover suburban light gray bearing vehicle identification number: SALSK2D48CA737577 |
| 4. One 2015 Tesla Motors, four-door sedan blue bearing vehicle identification number: 5YJSA1E24FF110159 |
| 5. One 2017 Volvo XC90 suburban black bearing vehicle identification number: YV4A22PL3H1164551 |
| 6. One 2018 Ferrari Cal convertible red bearing vehicle identification number: ZFF77XJA8J0227904 |
| 7. One 2015 Mercedes Benz S50 four-door sedan blue bearing vehicle identification number: WDDUG8FB6FA136985 |

(a.1-27, b.1-2, and c.1- , collectively, the “Substitute Assets”);

3) From my review of the case file, I am familiar with the facts and circumstances of this case. Because this declaration is being submitted for a limited purpose, I have not included in it everything I know about this case. Where the contents of documents and the actions, conversations, and statements of others are related herein, they are related in substance and in part.

The Information

4) On or about October 9, 2018, KAM WONG (the “defendant”), was charged in an Information, 18 Cr. 737 (JGK) (the “Information”), with, *inter alia*, embezzlement from a federally-insured credit union, in violation of Title 18, United States Code, Sections 657 and 2 (Count One).

Preliminary Order of Forfeiture/Money Judgment

5) On or about December 6, 2018, the Court entered a Consent Preliminary Order of Forfeiture/Money Judgment, which had been signed on November 19, 2018, imposing a forfeiture money judgment in the amount of \$9,890,375 in United States currency against the defendant (the “Money Judgment”), representing the amount of proceeds traceable to the offense charged in Count One of the Information.

6) To date, the defendant’s \$9,890,375 Money Judgment remains wholly unsatisfied.

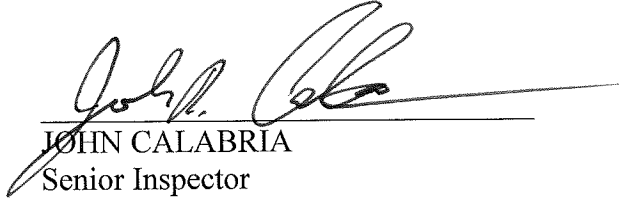
The Substitute Assets

7) Since the date of entry of the Consent Preliminary Order of Forfeiture, despite the exercise of due diligence in investigating the assets of the defendant, the Government has been unable to locate the proceeds of the defendant’s offense. Among other things, I have conducted public database searches and open source internet searches in an attempt to identify such assets, and have conducted queries within the Financial Crimes Enforcement Network database.

8) The Government has, however, identified the Substitute Assets identified in Paragraph 2, in which the defendant has an ownership interest, in whole or in part, which may be used to satisfy in part, the defendant's Money Judgment obligation.

I declare under penalties of perjury that the foregoing is true and correct, pursuant to Title 28, United States Code, Section 1746.

Dated: New York, New York
February 4, 2019


JOHN CALABRIA
Senior Inspector
United States Marshals Service

Sworn to or subscribed
before me this 4 day of February 2019.


Notary Public

CHRISTOPHER GERARD MCSHEA
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MC6240723
Qualified in Kings County
My Commission Expires May 09, 2019